



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Gregory C. Ehlke, Treasurer  
CitiGroup Inc. Political Action Committee  
153 East 53rd Street  
New York, NY 10043

OCT 8 1999

Identification Number: C00039305

Reference: July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99) and  
September Monthly (8/1/99-8/31/99) Reports

Dear Mr. Ehlke:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report includes computer produced formats of Schedule A. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b)

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free

number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Dominick Ciaraldi".

Dominick Ciaraldi  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Line Itemized Schedule A - PAGE OF Itemization Category or the Detailed Summary Page : FORM LINE NUMBER 11(a)(1)(b)																					
<p><b>Contributions from Individuals</b></p> <p>My information covers my contributions and deductions that may not be sold or used by any person for the purpose of making contributions or for commercial purposes other than using the name and address of my political committee to solicit contributions from other committees.</p> <p>NAME OF COMMITTEE OR PAC: National Organization PAC 000000001</p> <table border="1"> <tr> <td>1. Full Name, Mailing Address and ZIP code:  Anne Sullivan 21 18th Street City, State ZIP</td> <td>Name of Employer:  National Organization, Inc.</td> <td>Date Income Year:</td> <td>Amount of Cash Receipts per Period:  payroll deduction \$90.00</td> </tr> <tr> <td>Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General</td> <td>Position: Branch Manager</td> <td>Aggregate Total to Date: &gt; 1</td> <td>(WEEKLY) 260.00</td> </tr> <tr> <td colspan="2"></td> <td>Date Income Year:</td> <td>Amount of Cash Receipts per Period:  payroll deduction \$120.00</td> </tr> <tr> <td>2. Full Name, Mailing Address and ZIP code:  Rodney Jones 881 Kalorama Road City, State ZIP</td> <td>Name of Employer:  National Organization, Inc.</td> <td>Date Income Year:</td> <td>Amount of Cash Receipts per Period:  payroll deduction \$120.00</td> </tr> <tr> <td>Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General</td> <td>Position: Vice President</td> <td>Aggregate Total to Date: &gt; 5</td> <td>(WEEKLY) 280.00</td> </tr> </table>				1. Full Name, Mailing Address and ZIP code:  Anne Sullivan 21 18th Street City, State ZIP	Name of Employer:  National Organization, Inc.	Date Income Year:	Amount of Cash Receipts per Period:  payroll deduction \$90.00	Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General	Position: Branch Manager	Aggregate Total to Date: > 1	(WEEKLY) 260.00			Date Income Year:	Amount of Cash Receipts per Period:  payroll deduction \$120.00	2. Full Name, Mailing Address and ZIP code:  Rodney Jones 881 Kalorama Road City, State ZIP	Name of Employer:  National Organization, Inc.	Date Income Year:	Amount of Cash Receipts per Period:  payroll deduction \$120.00	Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General	Position: Vice President	Aggregate Total to Date: > 5	(WEEKLY) 280.00
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Itemize payroll deductions only after they have exceeded \$200 per calendar year from all individuals.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 1D4.B(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(1)(b) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

## IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Line Itemized Schedule A - PAGE OF Itemization Category or the Detailed Summary Page : FORM LINE NUMBER 11(a)(1)(b)									
<p><b>Contributions from Individuals</b></p> <p>My information covers my contributions and deductions that may not be sold or used by any person for the purpose of making contributions or for commercial purposes other than using the name and address of my political committee to solicit contributions from other committees.</p> <p>NAME OF COMMITTEE OR PAC: National Organization PAC 000000001</p> <table border="1"> <tr> <td>1. Full Name, Mailing Address and ZIP code:  Martin L. Kress 4 River Road City, State ZIP</td> <td>Name of Employer:  National Organization, Inc.</td> <td>Date Income Year: 8/18/94</td> <td>Amount of Cash Receipts per Period:  \$3,999.00 (IN-KIND) (RAFFLE PRIZE)</td> </tr> <tr> <td>Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General</td> <td>Position: Chairperson</td> <td>Aggregate Total to Date: &gt; 1</td> <td>3,999.00</td> </tr> </table>				1. Full Name, Mailing Address and ZIP code:  Martin L. Kress 4 River Road City, State ZIP	Name of Employer:  National Organization, Inc.	Date Income Year: 8/18/94	Amount of Cash Receipts per Period:  \$3,999.00 (IN-KIND) (RAFFLE PRIZE)	Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General	Position: Chairperson	Aggregate Total to Date: > 1	3,999.00
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Receivings for: <input type="checkbox"/> Personal <input type="checkbox"/> General	Position: Chairperson	Aggregate Total to Date: > 1	3,999.00								

SCHEDULE B ITEMIZED DISBURSEMENTS		Line Itemized Schedule B - PAGE OF Itemization Category or the Detailed Summary Page : FORM LINE NUMBER 81(b)									
<p><b>Operating Expenditures/Other Expenses</b></p> <p>My information covers my contributions and deductions that may not be sold or used by any person for the purpose of making contributions or for commercial purposes other than using the name and address of my political committee to solicit contributions from other committees.</p> <p>NAME OF COMMITTEE OR PAC: National Organization PAC 000000001</p> <table border="1"> <tr> <td>1. Recipient, Mailing Address and ZIP code:  Martin L. Kress 4 River Road City, State ZIP</td> <td>Purpose of Disbursement:  RAFFLE PRIZE</td> <td>Date Income Year: 8/18/94</td> <td>Amount of Cash Receipts per Period:  \$3,999.00 (IN-KIND CONTRIBUTION)</td> </tr> <tr> <td>Disbursement for: <input type="checkbox"/> Personal <input type="checkbox"/> Other</td> <td>Position: Chairperson</td> <td>Aggregate Total to Date: &gt; 1</td> <td>3,999.00</td> </tr> </table>				1. Recipient, Mailing Address and ZIP code:  Martin L. Kress 4 River Road City, State ZIP	Purpose of Disbursement:  RAFFLE PRIZE	Date Income Year: 8/18/94	Amount of Cash Receipts per Period:  \$3,999.00 (IN-KIND CONTRIBUTION)	Disbursement for: <input type="checkbox"/> Personal <input type="checkbox"/> Other	Position: Chairperson	Aggregate Total to Date: > 1	3,999.00
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Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 1D4.B(1)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.